

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

Plaintiffs,

v.

**COMMONWEALTH OF PUERTO RICO, et.
al.**

Defendants.

Case No. 12-2039 (GAG)

**MOTION FOR LEAVE TO FILE SPANISH LANGUAGE DOCUMENT AND
EXTENSION TO FILE THE ENGLISH TRANSLATION**

COME NOW the Commonwealth of Puerto Rico and the Puerto Rico Police Bureau (PRPB), through the undersigned counsel, and respectfully allege and pray as follows:

1. On October 12, 2018 the PRPB filed a *Joint Motion For Order Approving The Parties' Agreement To Extend Timeframes For Certain Activities In The Commonwealth's Action Plans*, together with an exhibit to be considered by this Honorable Court. The exhibit is in its original Spanish language version. (See Docket No. 978).
2. L.Cv.R.P. 5 (g) requires that all documents not in the English language, which are presented to or filed in this Court, must be accompanied at the time of presentation or filing by a certified translation into English. Moreover, the Jones Act requires that all pleadings and proceedings in the United States District Court for the District of Puerto Rico be conducted in the English language.

3. Nonetheless, the PRPB requests leave from this Court to permit at this time the filing of such exhibits in the Spanish language and a thirty (30) day extension of time, until November 14, 2018, to file the certified English translation of such exhibit at Docket No. 978-1.

4. In light of the foregoing, the PRPD respectfully requests from this Honorable Court that it be granted a brief extension of time of at least of thirty (30), to wit November 14, 2018, to file the certified English translation of the exhibit to which reference is made.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above stated and PRPB very respectfully requests that this Honorable Court grant an extension of thirty (30) days, until November 14, 2018, to file the certified English translation of the exhibit to which reference is made.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, October 15, 2018

WANDA VAZQUEZ GARCED
Secretary of Justice

WANDYMAR BURGOS VARGAS
Deputy in Charge of
General Litigation

SUSANA PEÑAGARICANO BROWN
Director Federal Litigation and
Bankruptcy

S/VALERIE CONCEPCIÓN CINTRÓN
Valerie Concepción Cintrón
U.S.D.C. NO. 303002
Federal Litigation Division
Department of Justice
P.O. Box 9020192
San Juan, P.R., 00902-0192
Tel. (787) 459-2799
vconcepcion@justicia.pr.gov